

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
WESTERN DIVISION**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	No. 07 CR 50058
)	
MARK COOPER,)	
)	
)	
Defendant.)	

DEFENDANT'S FIRST MOTION IN LIMINE

NOW COMES the Defendant, MARK COOPER, by and through his attorneys, BYRD & TAYLOR, ATTORNEYS AT LAW, by Christopher J. Taylor, and for his First Motion in Limine states as follows:

1. That the Co-Defendant, Charles Eubanks, has recently entered into a plea agreement wherein the Government required him to admit that Defendant, Mark Cooper, was involved in the robbery of Soto's Jewelry Store.
2. That according to Attorney David Brown the Government refused to discuss any plea agreement with Co-Defendant, Charles Eubanks, without his willingness to implicate Defendant, Mark Cooper.
3. That prior to the plea agreement, Co-Defendant, Charles Eubanks, had confessed his involvement in the Soto's Jewelry Store robbery and had indicated others, not Defendant, Mark Cooper, were the perpetrators of the offense.
4. That it is anticipated that the Government may attempt to admit evidence regarding Co-Defendant Charles Eubanks, plea agreement at trial herein.

5. That unless the Defendant, Mark Cooper, is allowed to call Attorney David Brown as a witness to testify regarding the pressure placed on Co-Defendant, Charles Eubanks, by the Government, the Government should not be allowed to present evidence regarding the results of the plea agreement.

WHEREFORE, the Defendant MARK COOPER, moves this Honorable Court for an Order in Limine barring the Government from presenting at trial any evidence or argument regarding the Co-Defendant, Charles Eubanks, plea agreement and the Statement of Facts contained therein and for such other relief as the Court deems equitable and just.

By /s/ Christopher J. Taylor
Christopher J. Taylor
Attorney for MARK COOPER

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